

C. DUKES SCOTT  
EXECUTIVE DIRECTOR

1111 Main Street, Suite 300  
Columbia, SC 29201



Main Line: 803 737-0300  
Legal Department: 803 737-0377

DAN E. ARNETT  
CHIEF OF STAFF

183744

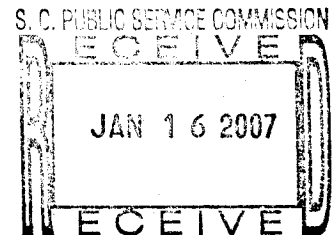
**VIA U.S. MAIL**

January 11, 2007

Marc Stollman, Esquire  
GSC Telecommunications, Incorporated  
181 East Evans St., Suite 205  
Florence, SC, 29506

Dr. Edward Johnson  
GSC Telecommunications, Incorporated  
181 East Evans St., Suite 205  
Florence, SC, 29506 Columbia, SC 29202-8416

FLORENCE P. BELSER  
GENERAL COUNSEL



Re: Application of GSC Telecommunications, Incorporated for a Certificate of Public Convenience and Necessity to Provide Facilities-Based Local Exchange and Resold Long Distance Telecommunications Services and for Flexible Regulation of Its Local Exchange Services and Alternative Regulation of Its Long Distance Service Offerings  
**Docket No. 2006-342-C**

Dear Dr. Johnson and Mr. Stollman:

Please find enclosed and served on you the Office of Regulatory Staff's First Continuing Data Requests in the above referenced matter. Please let me know if you have any questions.

Sincerely,

*Wendy B. Cartledge*

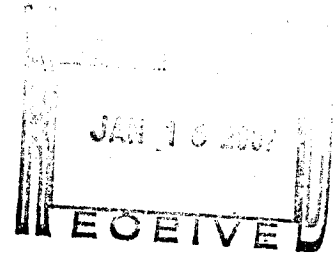
Wendy B. Cartledge

WBC/pjm  
Enclosure

cc: Charles L.A. Terreni, Esquire (w/encl)

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**

**DOCKET NO. 2006-342-C**



**IN RE:**

**Application of GSC Telecommunications,  
Inc. for a Certificate of Public Convenience )  
And Necessity to Provide Facilities Based ) OFFICE OF REGULATORY  
Local Exchange and Resold Long Distance ) STAFF'S FIRST CONTINUING  
Telecommunications Services and for Flexible ) DATA REQUEST  
Regulation Of Its Local Exchange Services )  
and Alternative Regulation of its Long Distance )  
Service Offerings )**

**TO: Marc Stollman, Esq. and Dr. Edward Johnson, GSC Telecommunications, Inc.:**

Pursuant to S.C. Code Ann. Section 58-4-10, 58-4-50, and 58-4-55, as enacted by 2004 S.C. Acts 175 and 26 S.C. Code Regs. 103-853 (Supp. 2005), the Office of Regulatory Staff hereby serves the within Data Requests upon GSC Telecommunications, Inc., (hereafter referred to as "GSC").

The Office of Regulatory Staff hereby requests, pursuant to 26 S.C. Code Regs. 103-851 (Supp. 2005), that you answer the following data requests in writing and under oath within ten (10) days after service at the Office of Regulatory Staff, 1441 Main Street, Suite 300, Columbia, South Carolina, 29201. If you are unable to respond to any of the data requests, or part or parts thereof, please specify the reason for your inability to respond and state what other knowledge or information you have concerning the unanswered portion.

As used in these data requests, "identify" means, when asked to identify a person, to provide the full name, business title, address and telephone number. When asked to identify a document, "identify" means to provide a full and detailed description of the document. In lieu of

providing a full and detailed description of a document, you may attach to your responses a copy of the document and identify the person who has custody of it. When the word "document" is used herein, it means any written, printed, typed, graphic, photographic, or electronic matter of any kind or nature and includes, but is not limited to, statements, contracts, agreements, reports, opinions, graphs, books, records, letters, correspondence, notes, notebooks, minutes, diaries, memoranda, transcripts, photographs, pictures, photomicrographs, prints, negatives, motion pictures, sketches, drawings, publications, and tape recordings.

Wherever in this data request a masculine pronoun or possessive adjective appears, it refers to both males and females in accordance with traditional English usage.

**IT IS THEREFORE REQUESTED:**

- I. That all information shall be provided to the South Carolina Office of Regulatory Staff in the format requested.
- II. That all responses to the data requests below be labeled using the same numbers as used herein.
- III. That the requested information be bound in 3-ring binders with numbered tabs between each question.
- IV. That if information requested is found in other places or other exhibits, reference shall not be made to those; instead, reproduce and place in the Data Request in the appropriate numerical sequence.
- V. That any inquiries or communications relating to questions concerning clarification of the data requested below should be directed to James McDaniel, of the South Carolina Office of Regulatory Staff.
- VI. That this entire list of questions be reproduced and included in front of each set of responses.
- VII. That each question be reproduced and placed in front of the response provided and the full name of the individual(s) providing the response be identified.
- VIII. That GSC provide six (6) paper copies of responses to the South Carolina Office of Regulatory Staff. In addition and if technically feasible, it is requested that GSC provide an electronic version of the responses.

- X. If the response to any data request is that the information requested is not currently available, please state when the information requested will be available.
- XI. That in addition to the signature and verification at the close of GSC responses, the GSC witness(es) or employee(s) or agent(s) responsible for the information contained in each response be indicated.
- XII. This Data Request shall be deemed to be continuing so as to require GSC to supplement or amend its responses as any additional information becomes available.
- XIII. For information requested herein where the information is kept, maintained, or stored using spreadsheets, please provide electronic versions of the spreadsheets, including the formulas used and embedded in the spreadsheet.

### **DATA REQUESTS**

- 1.1 Please provide a list of the names and addresses of all of GSC employees.
- 1.2 Please provide an organizational chart showing the corporate reporting structure.
- 1.3 Has GSC been ordered to pay any fines or penalties by any other state or federal regulatory agency?
- 1.4 Has any officer of GSC been convicted of a felony or a crime involving fraud?
- 1.5 Has any officer of GSC filed bankruptcy?
- 1.6 Has GSC's Certificate of Public Convenience and Necessity or Certificate of Authority in North Carolina or Kentucky ever been suspended?
- 1.7 Is the Stollman Law Firm and GSC located in the same office?

January 11, 2007

Wendy B. Cartledge  
Wendy B. Cartledge, Esquire  
**Office of Regulatory Staff**  
P.O. Box 11263  
Columbia, South Carolina 29211  
Phone: (803) 737-0800  
Fax: (803) 737- 0895

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**

**DOCKET NO. 2006-342-C**


**IN RE:**

<b>Application of GSC Telecommunications,</b>	
<b>Inc. for a Certificate of Public Convenience</b>	<b>)</b>
<b>And Necessity to Provide Facilities Based</b>	<b>) OFFICE OF REGULATORY</b>
<b>Local Exchange and Resold Long Distance</b>	<b>) STAFF'S FIRST CONTINUING</b>
<b>Telecommunications Services and for Flexible</b>	<b>) DATA REQUEST</b>
<b>Regulation Of Its Local Exchange Services</b>	<b>)</b>
<b>and Alternative Regulation of its Long Distance</b>	<b>)</b>
<b>Service Offerings</b>	<b>)</b>

This is to certify that I, Pamela J. McMullan, an employee with the Office of Regulatory Staff, have this date served one (1) copy of the **OFFICE OF REGULATORY STAFF'S FIRST CONTINUING DATA REQUESTS** in the above-referenced matter to the person(s) named below by causing said copy to be deposited in the United States Postal Service, first class postage prepaid and affixed thereto, and addressed as shown below:

Marc Stollman, Esquire  
GSC Telecommunications, Incorporated  
181 East Evans St., Suite 205  
Florence, SC, 29506

Dr. Edward Johnson  
GSC Telecommunications, Incorporated  
181 East Evans St., Suite 205  
Florence, SC, 29506

  
\_\_\_\_\_  
Pamela J. McMullan

January 11, 2007  
Columbia, South Carolina